

REMARKS

Applicants wish to express sincere thanks to the Examiner for the benefit of the Office Action of August 3, 2004. The Office Action shows that Examiner acknowledges that applicant's claimed subject matter is distinguished from the main cited reference considered alone, namely, the US Patent No. 4,793,400 to Wood; and that the issue therefore reduces to an appreciation of the distinguishing features between the presently claimed subject matter and JP 9-29,393 ("JP '393") and JP 9-29,394 ("JP '394") (collectively "the JP references") (alone and in combination with the Wood '400 patent). Stated simply, it is respectfully submitted that combining the teachings of Wood '400 with JP '393 and '394 does not disclose or suggest the presently claimed subject matter as presented in claims 1 through 19.

By the Office Action of August 3, 2004, claims 1-3, 8-13, 16 and 17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,793,400 to Wood and further in view of either JP 9-29,393 ("JP '393") or JP 9-29,394 ("JP '394"); and claims 4-7, 14-15, and 18-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Wood further in view of either JP '393 or JP '394 as applied in claim 1 above, and further in view of either U.S. Patent No. 3,795,025 to Sadamitsu or U.S. Patent No. 4,530,597 to Itaya et al. Office Action, pp. 2-3.

As the Office Action acknowledges, that there is no disclosure or suggestion in Wood '400 of providing two brushes of different character to perform different functions in cleaning the casting surfaces of the casting roll at different times during a casting operation, and that there is no disclosure or suggestion in Wood '400 of a main brush and another brush being moved independently into engagement with the casting surfaces of the casting rolls during different times. Office Action at 3-4. Instead, the JP references are relied upon by the rejection to teach these feature when combined with the disclosure of the Wood '400 patent.

It is respectfully submitted, however, that the rejection fails to appreciate that even the combined disclosures of the JP references and the '400 patent **does not** disclose or suggest the presently claimed subject matter. Particularly, absent from the disclosure or suggestion of the JP references alone or in combination with Wood '400 is the following elements of independent claim 1:

moving the sweeper brush independently of the main brush into engagement with the casting roll surface of the casting roll **near the beginning and end of each casting run and to disengage from the casting roll during normal casting operation;** and moving the main brush into engagement with the casting roll surface **at least during normal casting operation.**

(emphasis added) Similarly, absent from the disclosure or suggestion of the JP references alone or in combination with Wood '400 is the following elements of independent claim 12:

(v) rotating the main brushing device mounted on a mounting frame about its longitudinal axis to engage with the casting roll **at least during production of a casting run,** (vi) moving the main brush into engagement with the casting roll **during production of the casting run,** and (vii) separately moving the sweeper brush toward the casting roll **at the start and end of the casting run and away from the casting roll during the production part of the casting run.**

(emphasis added.) Accordingly, the claimed subject matter of independent claims 1 and 12, as well as dependent claims 2-11 and 13-19, are not obvious under §103 in view of the cited references.

In JP '393 and JP '394, brush rolls 50 . . . are employed in the initial stage of casting, and . . . , after the initial stage of casting has passed, brush rolls 6 . . . are employed." JP '393 translation at 3, 7; JP '394 translation 3, 7. Thus, the two brushes 5 and 6 in the JP references are both engaged during the casting operation, one at the initial stage and one at the later stage. By contrast, in the presently claimed subject, the main brush is engaged during the entire "normal casting operation." See claim 1. Stated another way, in the presently claimed subject, the main brushing device is engaged with the casting rolls "during the production of the casting run" as described in claim 12. Thus, in the presently claimed subject matter, unlike the teaching of the JP references, there is only one brush in the present claimed subject matter engaging the casting roll surfaces during normal casting operation.

Conversely, in the JP references, nothing is said about a separate brush, a sweeper brush or otherwise, engaging the casting roll surfaces "near the beginning and end of each casting run and . . . disengage[d] from the casting roll during normal casting operation." Further, neither the JP references alone nor in combination with Wood '400 teach anything as to what brush, if any, is engaged with the casting roll surfaces at the end of each casting run.

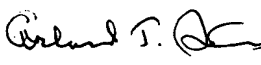
Secondary references Sadamitsu and Itaya et al. are even more remote prior art. Sadamitsu discloses a photoreceptor cleaning apparatus for an electrophotographic apparatus having a pair of rotating brushes enclosed within a brush box and engaging the photo sensitive drum. The brushes counter-rotate and the material is sweep from the photo

sensitive drum is sweep away from the brushes through a filtering bag within a suction box. In Sadamitsu there is no suggestion of brushes of different characteristics to be used independently during different times in the operation of the apparatus. Itaya et al. discloses a large brush cleaning device for an electrophotographic reproduction apparatus wherein a fur brush is contacted as the image receptor for removing electromagnetic toner. In Itaya et al., there is only one brush. None of the features deficient from Wood '400 alone, or in combination with the JP references, are disclosed or suggested by either of these secondary references as presented in claims 4-7, 14-15, and 18-19. Moreover, there is no clear and particular suggestion to combine these references in any event as the rejection proposes.

Applicants respectfully submit that presented **method** claims 1-19 are in condition for allowance and should be allowed with the application passed to issue. The cited references are evidence on **non**-obviousness from the presently claimed subject matter, or remote prior art from the presently claimed subject matter.

Respectfully,

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